

# **Exhibit B**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

The Woodlands Pride, Inc.; Abilene  
Pride Alliance; Extragrams, LLC; 360  
Queen Entertainment LLC; Brigitte  
Bandit,

Plaintiffs,

v.

Civil Action No. 4:23-cv-02847

Angela Colmenero, in an official capacity as Interim Attorney General of Texas; The Woodlands Township; Montgomery County, Texas; Brett Ligon, in an official capacity as District Attorney of Montgomery County; City of Abilene, Texas; Taylor County, Texas; James Hicks, in an official capacity as District Attorney of Taylor County; Delia Garza, in an official capacity as County Attorney of Travis County; Joe D. Gonzales, in an official capacity as District Attorney of Bexar County,

Defendants.

**PLAINTIFFS' TRIAL WITNESS LIST**

No.	Witness Name
1.	<p><b>Kerry Lynn Sieff<sup>1</sup></b></p> <p><input checked="" type="checkbox"/> <b>Live</b>      <input type="checkbox"/> Deposition  <input checked="" type="checkbox"/> <b>Fact</b>      <input type="checkbox"/> Expert      <input type="checkbox"/> Record Custodian</p> <p><i>Brief description of witness capacity and testimonial topics:</i></p> <p>Kerry Lynn Sieff is the Founder and Creative Services Director of Plaintiff Extragrams, LLC (“Extragrams”). Ms. Sieff will testify on behalf of Extragrams about the nature of drag performances, performing drag in public, the impact SB 12 will have on her businesses, the vagueness of SB 12, the irreparable harm Extragrams will suffer if SB 12 is not enjoined, and other topics in Ms. Sieff’s declaration filed in support of Plaintiffs’ Motion for Temporary Restraining Order and Preliminary Injunction (Dkt. No. 10-4).</p>
2.	<p><b>Richard Montez Jr.</b></p> <p><input checked="" type="checkbox"/> <b>Live</b>      <input type="checkbox"/> Deposition  <input checked="" type="checkbox"/> <b>Fact</b>      <input type="checkbox"/> Expert      <input type="checkbox"/> Record Custodian</p> <p><i>Brief description of witness capacity and testimonial topics:</i></p> <p>Richard Montez Jr. is the co-owner of Plaintiff 360 Queen Entertainment LLC (“360 Queen Entertainment”). Mr. Montez will testify on behalf of 360 Queen Entertainment about drag being beloved in Texas, how SB 12 threatens drag performances anywhere that minors might be present, even if businesses attempt to limit performances for adults, the harm SB 12 will have on businesses, the</p>

---

<sup>1</sup> Ms. Sieff’s home address, as with the other Plaintiffs, is not currently listed on this trial witness list due to reasons of personal safety and threats of violence associated with this lawsuit. See Dkt. 22 (Unopposed Motion For Leave to Proceed Under a Pseudonym by Brigitte Bandit); Dkt. 36 (Order Granting Motion for Leave to Proceed Under a Pseudonym). Plaintiffs may be contacted through the undersigned counsel and their addresses will be made available to the Court or Defendants upon request. See also *United States v. Alston*, 460 F.2d 48, 52 (5th Cir. 1972) (permitting witnesses not to reveal their addresses on the public record, particularly where “the physical safety of the witness or his family might be endangered by disclosure”).

	inherent expressiveness of drag, the vagueness of SB 12, the irreparable harm 360 Queen Entertainment will suffer if SB 12 is not enjoined, and other topics in Mr. Montez's declaration filed in support of Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction (Dkt. No. 10-5).
3.	<p><b>Gavyn Hardegree<sup>2</sup></b></p> <p><input checked="" type="checkbox"/> <b>Live</b>      <input type="checkbox"/> Deposition  <input checked="" type="checkbox"/> <b>Fact</b>      <input type="checkbox"/> Expert      <input type="checkbox"/> Record Custodian</p> <p><i>Brief description of witness capacity and testimonial topics:</i></p> <p>Gavyn Hardegree is the President of Plaintiff Abilene Pride Alliance ("Abilene Pride"). Mx. Hardegree will testify on behalf of Abilene Pride about the impact SB 12 will have in West Texas, how SB 12 will impact trans and non-binary people in Texas, the threat of enforcement squelching free expression like local Pride events, the vagueness of SB 12, the irreparable harm Abilene Pride will suffer if SB 12 is not enjoined, and other topics in Mx. Hardegree's declaration filed in support of Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction (Dkt. No. 10-3).</p>
4.	<p><b>Jason Rocha</b></p> <p><input checked="" type="checkbox"/> <b>Live</b>      <input type="checkbox"/> Deposition  <input checked="" type="checkbox"/> <b>Fact</b>      <input type="checkbox"/> Expert      <input type="checkbox"/> Record Custodian</p> <p><i>Brief description of witness capacity and testimonial topics:</i></p> <p>Jason Rocha is the Founder and President of Plaintiff The Woodlands Pride, Inc. ("Woodlands Pride"). Mr. Rocha will testify on behalf of Woodlands Pride about the effect SB 12 will have on local community events, the threat of enforcement squelching free expression like local Pride events, the vagueness of SB 12, the irreparable harm Woodlands Pride will suffer if SB 12 is not enjoined, and other topics in Mr. Rocha's declaration filed in support of Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction (Dkt. No. 10-2).</p>

---

<sup>2</sup> Mx. Hardegree's legal name is Gabrielle Hardegree, but they go by Gavyn Hardegree in all aspects of their life.

5.	<b>Brigitte Bandit<sup>3</sup></b>
	<p><input checked="" type="checkbox"/> <b>Live</b>      <input type="checkbox"/> Deposition</p> <p><input checked="" type="checkbox"/> <b>Fact</b>      <input type="checkbox"/> Expert      <input type="checkbox"/> Record Custodian</p> <p><i>Brief description of witness capacity and testimonial topics:</i></p> <p>Plaintiff Brigitte Bandit is a drag artist and performer. Ms. Bandit will testify about her experience as a drag artist, how drag artists tailor performances to their audiences, why it is meaningful to have drag performances for all ages, the inherently expressive nature of drag, the threats facing drag artists, the impact of SB 12 on drag artists, the threat of criminal and civil penalties on drag artists squelching free expression, the vagueness of SB 12, the irreparable harm Ms. Bandit will suffer if SB 12 is not enjoined, and other topics in Ms. Bandit's declaration filed in support of Plaintiffs' Motion for Temporary Restraining Order and Preliminary Injunction (Dkt. No. 10-6).</p>

DATED: August 23, 2023

---

<sup>3</sup> Pursuant to this Court's order, Dkt. 36 (Order Granting Motion for Leave to Proceed Under a Pseudonym), Plaintiff Brigitte Bandit is proceeding in this action under a pseudonym.

Respectfully submitted,

/s/Brian Klosterboer

Brian Klosterboer, attorney-in-charge

TX Bar No. 24107833

SDTX No. 3314357

Chloe Kempf

TX Bar No. 24127325

SDTX No. 3852674

Thomas Buser-Clancy

TX Bar No. 24078344

SDTX No. 1671940

Edgar Saldívar

TX Bar No. 24038188

SDTX No. 618958

Adriana Pinon

TX Bar No. 24089768

SDTX No. 1829959

ACLU FOUNDATION OF TEXAS, INC.

P.O. Box 8306

Houston, TX 77288

Tel. (713) 942-8146

Fax (713) 942-8966

[bklosterboer@aclutx.org](mailto:bklosterboer@aclutx.org)

[ckempf@aclutx.org](mailto:ckempf@aclutx.org)

[tbuser-clancy@aclutx.org](mailto:tbuser-clancy@aclutx.org)

[esaldivar@aclutx.org](mailto:esaldivar@aclutx.org)

[apinon@aclutx.org](mailto:apinon@aclutx.org)

Derek McDonald

TX Bar No. 00786101

SDTX No. 18546

Maddy Dwertman

TX Bar No. 24092371

SDTX No. 3853795

BAKER BOTTs L.L.P.

401 S. 1<sup>st</sup> Street, Suite 1300

Austin, TX 78704

Tel. (512) 322-2500

Fax (512) 322-2501

[Derek.McDonald@BakerBotts.com](mailto:Derek.McDonald@BakerBotts.com)

[Maddy.Dwertman@BakerBotts.com](mailto:Maddy.Dwertman@BakerBotts.com)

Brandt Thomas Roessler

TX Bar No. 24127923

SDTX No. 3853796

BAKER BOTTs L.L.P.

30 Rockefeller Plaza

New York, NY 10112

Tel. (212) 408-2500

Fax (212) 408-2501

[Brandt.Roessler@BakerBotts.com](mailto:Brandt.Roessler@BakerBotts.com)

Ali Andrews

TX Bar No. 24059381

SDTX No. 2247339

Emily Rohles

TX Bar No. 24125940

SDTX No. 3715273

BAKER BOTTs L.L.P.

910 Louisiana Street

Houston, TX 77002

Tel. (713) 229-1234

Fax (713) 229-1522

[Ali.Andrews@BakerBotts.com](mailto:Ali.Andrews@BakerBotts.com)

[Emily.Rohles@BakerBotts.com](mailto:Emily.Rohles@BakerBotts.com)

*Attorneys for Plaintiffs*